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COMMONWEALTH of VIRGINIA

Department of Health
Richmond, Va. 23219

JAMES B. KENLEY, M.D.
COMMISSIONER

March 22, 1984

Darius C. Ostrauskas
USEPA - Region III
Curtis Building
Sixth and Walnut Streets
Philadelphia, PA 19106

Dear Darius:

In addition to a report summary stating, "No Further Action" on six sites covered in this report, the authors suggest certain potential pollution areas at two sites should be addressed by assigning a low priority assessment. These potential problems might be addressed under RCRA regulations for groundwater protection, (40 CFR, Part 264, Subpart F) that cover detection monitoring, compliance monitoring (if possible, groundwater impacts are identified) and corrective action. In addition, the State Water Control Board's antidegradation policy for groundwater quality could be used as the motivating factor.

The following potential problems could exist and develop in time at Reynolds Plants covered in this report.

1. The underground solvent storage tanks should be monitored for leakage at the Bellwood Print Plant (VA-215). There are a number of domestic wells (approximately 25) within a half-mile radius of these tanks. Well records indicate that there is mostly sand and gravel formations found above the water aquifer at this site. In this case shallow monitoring wells are suggested around these underground storage tanks. The alternative to this would be a yearly tank pressure test for possible leakage.
2. Also noted was a stream of brown, rust-colored leachate that emerged from the landfill located to the rear of the Reclamation Plant (VA-216). This leachate flowed into a small creek that acted as a tributary to Proctor's Creek. By sampling this leachate and analyzing for a scan of metals and organics, a better definition of problems that could be developing in the future from this landfill could be derived. Mr. C. Bent (Reynolds employee) indicated that waste from the Bellwood complex (1942-1980 era) was either landfilled on company property or placed in pits and burned on the complex property.

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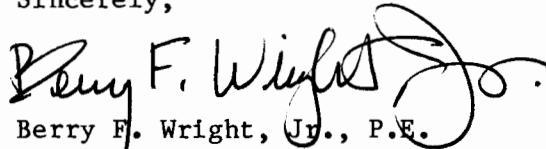
3. At the Reynolds Grottoes Plastic Plant (VA-218), the underground metal waste alcohol storage tanks are twenty to thirty years old. There are many domestic wells located within a two-mile radius of this plant and, in addition, the water supply for the town of Grottoes (population 1500) is taken from wells located less than a mile to the northeast of this plant. Geologically speaking, the alluvium soil beneath the Grottoes Plant is very permeable. Shallow monitoring wells are recommended around these underground storage tanks, or in place of this a leakage pressure test could be warranted.

If wells are decided upon, they should be downgradient and along the same strike of the rock beds. The wells should be about six meters deep and located as close to the underground tanks as possible.

Other sites discussed in this report require "No Further Action." Upon site inspection, wastes reported under NOTIS were found not to present a potential problem.

If you have any questions or comments regarding the contents of this letter, please call me.

Sincerely,



Berry F. Wright, Jr., P.E.
Acting Director
Bureau of Solid Waste Management

BFW/RCW/KLG/mcw

Attachment